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Attorneys for Defendants Galena Biopharma, Inc.,
Ryan M. Dunlap, Remy Bernarda, and Mark Schwartz

UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
PORTLAND DIVISION

**In re GALENA BIOPHARMA, INC.
SECURITIES LITIGATION**

Case No.: 3:14-cv-00367-SI (Lead)
Related Cases: 3:14-cv-00389-SI
3:14-cv-00410-SI
3:14-cv-00435-SI
3:14-cv-00558-SI

STIPULATION FOR BRIEFING
SCHEDULE OF DEFENDANTS GALENA
BIOPHARMA, INC., RYAN M. DUNLAP,
MARK W. SCHWARTZ, REMY
BERNARDA, STEVEN KRIEGSMAN,
RICHARD CHIN, RUDOLPH NISI,
STEPHEN GALLIKER, SANFORD
HILLSBERG, AND MARK J. AHN

WHEREAS, on October 31, 2014, Lead Plaintiffs Kisok Cho, Anthony Kim, Pantelis Lavidas, and Joseph Buscema (“Lead Plaintiffs”) and Plaintiff Alan Theriault (collectively, the “Plaintiffs”) filed their Consolidated Class Action Complaint for Violations of the Federal Securities Laws (the “Complaint”) (Dkt. No. 59), naming as Defendants, among others, Galena Biopharma, Inc., Ryan M. Dunlap, Remy Bernarda, Mark Schwartz, Steven Kriegsman, Richard Chin, Rudolph Nisi, Stephen Galliker, Sanford Hillsberg, and Mark J. Ahn;

WHEREAS, on January 9, 2015, Defendants Galena Biopharma, Inc., Ryan M. Dunlap, Remy Bernarda, and Mark Schwartz (“Galena Defendants”) filed their motion to dismiss (Dkt. No. 82);

WHEREAS, on January 9, 2015, Defendants Steven Kriegsman, Richard Chin, Rudolph Nisi, Stephen Galliker, and Sanford Hillsberg (“Outside Director Defendants”) filed their motion to dismiss (Dkt. No. 80);

WHEREAS, on January 9, 2015, Defendants Mark J. Ahn filed his motion to dismiss (Dkt. No. 81);

WHEREAS, on August 5, 2015, the Court issued its Opinion and Order (Dkt. No. 149) granting in part and denying in part the Defendants’ motion to dismiss;

WHEREAS, the Court’s Opinion and Order, issued on August 5, 2015, granted Plaintiffs leave to file an amended complaint within 28 days from the date of the Opinion and Order;

WHEREAS, Plaintiffs do not intend to file an amended complaint;

WHEREAS, Plaintiffs, Galena Defendants, Outside Director Defendants, and Defendant Mark J. Ahn (collectively, the “Parties”) are actively engaged in settlement discussions and believe that they are close to reaching a settlement agreement;

WHEREAS, the Parties agree that setting the deadline for Galena Defendants, Outside Director Defendants, and Defendant Mark J. Ahn for November 30, 2015 will allow the parties to focus on negotiating a settlement agreement that will be presented to the Court for approval; and

WHEREAS, Plaintiffs, Galena Defendants, Outside Director Defendants, and Defendant Mark J. Ahn have entered into a stipulation that Galena Defendants, Outside Director Defendants, and Defendant Mark J. Ahn shall file and service their answer to the complaint by November 30, 2015.

NOW THEREFORE, it is agreed, subject to the approval of the Court, that:

1. Plaintiffs will not file an amended complaint as against Galena Defendants, Outside Director Defendants, and Defendant Mark J. Ahn;
2. Galena Defendants, Outside Director Defendants, and Defendant Mark J. Ahn shall file and service their answer to the complaint by November 30, 2015.

IT IS SO STIPULATED:

Dated: October 30, 2015

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